

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) (Jointly Administered)
)

**NOTICE OF PROPOSED STIPULATED ORDER GRANTING MOTION OF IOWA
CITY AMBULATORY SURGICAL CENTER, LLC FOR ENTRY OF AN ORDER
GRANTING RELIEF FROM THE AUTOMATIC STAY TO ISSUE A NOTICE OF
INTENT TO OBTAIN A PURCHASE PRICE DETERMINATION**

PLEASE TAKE NOTICE that, on March 1, 2024, Iowa City Ambulatory Surgical Center, LLC (“ICASC”) filed its *Motion of Iowa City Ambulatory Surgical Center, LLC for Entry of an Order Granting Relief from the Automatic Stay to Issue a Notice of Intent to Obtain a Purchase Price Determination* [Docket No. 799] (the “Stay Relief Motion”).

PLEASE TAKE FURTHER NOTICE that the Stay Relief Motion sought an order from this Court terminating and/or modifying the automatic stay for the limited purpose of allowing ICASC to issue a notice of intent to obtain a Purchase Price Determination.

PLEASE TAKE FURTHER NOTICE that a hearing on the Stay Relief Motion occurred on March 29, 2024 and was continued and reset for April 5, 2024 at 2:30 PM (the “Stay Relief Hearing”) to allow the movant and objecting parties to work on a consensual resolution via preparation of a mutually agreeable stipulated order.

PLEASE TAKE FURTHER NOTICE that the Debtors, the Secured Bondholder Representatives and ICASC have agreed to the proposed stipulated order attached hereto as **Exhibit A** granting the Stay Relief Motion on the terms set forth therein (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 4001-1(a), counsel for ICASC solicited review of the Proposed Order by the Official Committee of Unsecured Creditors (the “Committee”) and ICASC can represent that the Committee also assents to the Proposed Order.

PLEASE TAKE FURTHER NOTICE that the Debtors, the Secured Bondholder Representatives and ICASC respectfully request that the Court enter the Proposed Order without further need for the Stay Relief Hearing.

¹ The Debtors include Mercy Hospital, Iowa City, Iowa (Case No. 23-00623), Mercy City, ACO, LLC (Case No. 23-00622), and Mercy Services Iowa City, Inc. (Case No. 23-00624).

Dated: April 4, 2024

/s/ Michael T. Gustafson

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Center, LLC*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 4th day of April, 2024, the foregoing document was electronically filed with the Clerk of Bankruptcy Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

Executed: April 4, 2024

/s/ Michael T. Gustfson

Partner, Faegre Drinker LLP